

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**MICHELE PARK, on behalf of herself and  
other similarly situated employees**

**17 Civ. 0720 (NSR) (JCM)**

**Plaintiff(s),**

**-against-**

**NOTICE OF MOTION  
TO STRIKE  
DEFENDANTS' ANSWER**

**SANCIA HEALTHCARE, INC., aka  
SANCIA WELLNESS, PENNYE W. NASH,  
AS EXECUTIVE DIRECTOR AND  
INDIVIDUALLY, and IAN DAVIS AS  
PRESIDENT AND INDIVIDUALLY**

**Defendants.**

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**PLEASE TAKE NOTICE**, that upon the attached Memorandum of Law, dated January 4, 2019, and upon the all prior proceedings had, a Motion will be made before the Honorable Magistrate Judge Judith C. McCarthy, at the Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse, located at 300 Quarropas Street, Courtroom 421, White Plains, State of New York, on the 25<sup>th</sup> day of January, 2019, at 10:00 a.m. or as soon thereafter as Counsel can be heard, for an Order to Strike Defendants Answer and impose sanctions on Defendants, pursuant to the Federal Rules of Civil Procedure 37(b) (2), and grant Plaintiff any further relief this Court may deem proper, including but not limited to Attorney's fees and costs, pursuant to the Court's inherent power.

**PLEASE TAKE FURTHER NOTICE**, that a copy of the Answering Papers to this Motion shall be served on Plaintiff by January 18, 2019, at the address stated below in accordance with the Federal Rules of Civil Procedure, the Local Rules of the Southern District Court of New York, and this Court's Order of December 6, 2018.

Dated: New York, New York  
January 4, 2019

Respectfully Submitted,

By: \_\_\_\_\_ /s/  
Lee Nuwesra (LN 5851)  
*Attorney for Plaintiff*  
One Grand Central Place  
60 E. 42<sup>nd</sup> Street, Suite 1132  
New York, New York 10165  
Tel#: (212) 370-8707  
lnuwesra@optonline.net

To: Sancia Healthcare, Inc.  
20 Church Street  
White Plains, NY 10601

Pennye W Nash  
20 Church Street  
White Plains, NY 10601

Ian Davis  
20 Church Street  
White Plains, NY 10601